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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

The United States filed its proposed Voir Dire on September 6, 2011. As the Court is aware, the Defendant and the Confidential Human Source (CHS) utilized in this case, are white supremacists. The United States did not initially include proposed voir dire questions as to that issue, however, submits that based upon the Defendants recent trial filings, it is clear that their defense will be focusing a great deal on the Defendant's association and belief in White Supremacy. As a result, the United States believes that these additional questions should be asked of the proposed jury.

1. You will hear that Mr. Kurt and a witness or witnesses are members of White Supremacy Groups and that they follow those beliefs. Will you be able to listen to and judge the evidence fairly and impartially knowing the accused and/or witnesses are white supremacists?

2. Have you, any member of your family or anyone close to you, been a member of or held the beliefs of the white supremacist movement?

1 3. Have you, any member of your family or anyone close to you, been the
2 victim of a hate crime motivated by your race or religion?

3 4. Have you, any member of your family or anyone close to you, been charged
4 or convicted of any crime which was motivated by race or religion?

5 5. Have you, any member of your family or anyone close to you, conducted
6 any research or studied the white supremacist movement?

7 DATED October 14, 2011.

8 Michael C. Ormsby
9 United States Attorney

10 s/ Earl A. Hicks

11 Earl A. Hicks
12 Assistant United States Attorney

13 I hereby certify that on October 14, 2011, I electronically filed the foregoing
14 with the Clerk of the Court using the CM/ECF System which will send
15 notification of such filing to the following, and/or I hereby certify that I have
16 mailed by United States Postal Service the document to the following non-
17 CM/ECF participant(s):

18 Richard D. Wall
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22 s/ Earl A. Hicks

23 Earl A. Hicks
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